

1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

4 MAY 4 2011
5 WILLIAM M. McCOOL, Clerk
6 By [Signature] Deputy

7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
AT TACOMA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 JONELLE LAJOHN BRAUN,

13 Defendant.

CR 11 NO 5241 BHS

INDICTMENT

14
15 The Grand Jury charges that:

16 **COUNT ONE**
17 **(Felon in Possession of Firearm)**

18 On or about January 28, 2011, within the Western District of Washington, the
19 defendant, JONELLE LAJOHN BRAUN, having been convicted of a crime punishable
20 by imprisonment for a term exceeding one year, to wit:

- 21 • Third Degree Assault. Pierce County Superior Court (Juvenile Court)
Cause No. 00-8-00788-1.
- 22 • Second Degree Possession of Stolen Property. Pierce County Superior
23 Court (Juvenile Court) Cause No. 03-8-01625-7.
- 24 • Residential Burglary. Pierce County Superior Court (Juvenile Court) Cause
25 No. 04-8-02691-9.
- 26 • Attempted Unlawful Delivery of a Controlled Substance (Cocaine). Pierce
27 County Superior Court Cause No. 07-1-00107-9.
- 28 • Second Degree Unlawful Possession of a Firearm (two counts). Pierce
County Superior Court Cause No. 08-1-02145-1.

INDICTMENT
U.S. v. BRAUN

- Unlawful Delivery of a Controlled Substance (Cocaine). Pierce County Superior Court Cause No. 09-1-03222-1.

did knowingly possess a firearm, to wit, a Winchester 30.06 model 70 rifle, serial number G290167, which had been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWO
(Felon in Possession of Firearm)

On or about February 23, 2011, within the Western District of Washington, the defendant, JONELLE LAJOHN BRAUN, having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit:

- Third Degree Assault. Pierce County Superior Court (Juvenile Court) Cause No. 00-8-00788-1.
- Second Degree Possession of Stolen Property. Pierce County Superior Court (Juvenile Court) Cause No. 03-8-01625-7.
- Residential Burglary. Pierce County Superior Court (Juvenile Court) Cause No. 04-8-02691-9.
- Attempted Unlawful Delivery of a Controlled Substance (Cocaine). Pierce County Superior Court Cause No. 07-1-00107-9.
- Second Degree Unlawful Possession of a Firearm (two counts). Pierce County Superior Court Cause No. 08-1-02145-1.
- Unlawful Delivery of a Controlled Substance (Cocaine). Pierce County Superior Court Cause No. 09-1-03222-1.

//

//

//

//

//

//

//

//

INDICTMENT
U.S. v. BRAUN

1 did knowingly possess a firearm, to wit, a Llama .380 caliber semi-automatic pistol, serial
2 number 595250, which had been shipped and transported in interstate commerce.

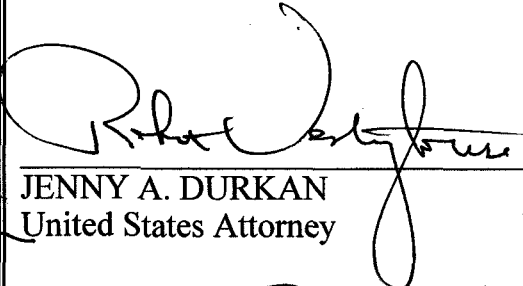
3 All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).


4 A TRUE BILL:


5 DATED:

6 *Signature of Foreperson redacted pursuant to*
7 *the policy of the Judicial Conference of the*
8 *United States*

9 FOREPERSON

10 
11 JENNY A. DURKAN
12 United States Attorney

13 
14 TODD GREENBERG
15 Assistant United States Attorney

16 
17 JESSE WILLIAMS
18 Special Assistant United States Attorney

19
20
21
22
23
24
25
26
27
28
INDICTMENT
U.S. v. BRAUN